



05-196

STATE OF MICHIGAN

JENNIFER M. GRANHOLM
GOVERNOR

EMERGENCY TELEPHONE SERVICE COMMITTEE
EAST LANSING

SHERIFF DALE GRIBLER
CHAIR

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July 22, 2005

Chairman Kevin J. Martin
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Dear Chairman Martin,

Please accept this letter on behalf on the Michigan Emergency Telephone Service Committee (ETSC). The Michigan ETSC was established under Michigan's Public Act 79 of 1999. It consists of 21 organizations serving both the public and private sector, which work together to promote the successful development, implementation, and operation of 9-1-1 systems across the state of Michigan.

As the state committee tasked with facilitating Michigan 9-1-1 we are submitting this letter as part the requested input during the FCC's proposed rule-making period for the implementation of Voice over Internet Protocol (VoIP) FCC Order 05-116. The Michigan ETSC respectfully requests that serious consideration be given to the development of a centralized system for mandatory registration/qualification of VoIP providers.

A registration/qualification system would serve to ensure that only authorized providers access the 9-1-1 system. It would also provide PSAPs with access to needed information, while protecting information that is proprietary to VoIP providers. Because it would provide a base information infrastructure, a centralized/qualification system could be used in the future migration to an IP-based 9-1-1 network.

We would propose this registration/qualification system must include the provider's essential contact information such as the provider's 24 X 7 network operation center (NOC) and corporate administrative contact information. The registration/qualification system should also require VoIP providers to identify their connectivity format to publicly switched 9-1-1 system and method or provider of their 9-1-1 database maintenance system.

The ETSC has the highest degree of respect for the challenges facing the FCC in the approaching growth of VoIP. Its future effect on communications may well be tremendous. The FCC's recognition and support of 9-1-1 accessed through VoIP will be essential to the continued vitality of 9-1-1's critical service.

Sincerely,


Dale Gribler
Chairman, Michigan ETSC


William Charon
Vice Chairman, Michigan ETSC

Association of Public Safety Communications Officials • Commercial Mobile Radio Service • Department of Labor and Economic Growth •
Department of State Police • Deputy Sheriff's Association • Fraternal Order of Police • Michigan Association of Ambulance Services •
Michigan Association of Chiefs of Police • Michigan Association of Counties • Michigan Communications Directors Association • Michigan Association of Fire Chiefs •
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